

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

**KEVONGH J. GRANT,**

**PLAINTIFF,**

**VS.**

**APTIM ENVIRONMENTAL AND  
INFRASTRUCTURE, INC., ET AL.,**

**DEFENDANTS.**

**CASE NO. 1:19-CV-0025**

**NOTICE OF NEGOTIATED EXTENSION OF DEADLINE TO  
RESPOND TO FIRST AMENDED COMPLAINT**

Now comes Odebrecht Construction, Inc., specially appearing through undersigned counsel, and gives notice pursuant to LRCi 6(b)(7) that plaintiff has agreed to grant it until **January 31, 2022** to file a response to the complaint in this matter. Odebrecht Construction expressly reserves all objections to personal jurisdiction and all affirmative defenses including, without limitation, defenses based upon the passage of the statute of limitations.

Respectfully submitted,

**ANDREW C. SIMPSON, P.C.,**

Counsel for Odebrecht Construction, Inc.

January 10, 2022

/s/ Andrew C. Simpson

By: Andrew C. Simpson, VI Bar No. 451

ANDREW C. SIMPSON, P.C.

2191 Church Street, Suite 5

Christiansted, VI 00820

Tel: 340.719.3900

[asimpson@coralbrief.com](mailto:asimpson@coralbrief.com)